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12 *Antonio J. Gracias, James Murdoch, Kimbal Musk,*

And Linda Johnson Rice

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16
17
18 IN RE TESLA, INC. SECURITIES
19 LITIGATION

Case No. 3:18-cv-04865-EMC

**[PROPOSED] ORDER GRANTING
DEFENDANT'S ADMINISTRATIVE
MOTION TO SEAL**

THE COURT, having considered Defendants Tesla, Inc., Elon Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda Johnson Rice (together, “Defendants”) Administrative Motion to File Under Seal passages in their Opposition to Plaintiff’s Partial Motion for Summary Judgment, and confidential exhibits and testimony used in support thereof, the Declaration of Nathaniel Smith, and all other filings in this case, has found:

(1) There exist compelling reasons to seal these materials that overcome the right of public access to these materials;

(2) A substantial probability exists that the overriding interest will be prejudiced if these materials are not sealed;

(3) The proposed sealing is narrowly tailored; and

(4) No less restrictive means exist to achieve the overriding interest (CRC 2.550(d));

HEREBY ORDERS THAT:

Because the documents listed below contain material that is sealable pursuant to Northern District of California Civil Local Rule 79-5, Defendants’ Administrative Motion to Seal is hereby **GRANTED as follows:**

Document	Portion to be Sealed	Designee	Ruling
Defendants’ Opposition	Portions highlighted in yellow	Defendants	
Exhibit 76	Entirety	Defendants	
Exhibit 81	Entirety	Defendants	
Exhibit 94	Entirety	Defendants	
Exhibit 105	Entirety	Defendants	
Exhibit 106	Entirety	Defendants	
Exhibit 109	Entirety	Defendants	
Exhibit 121	Entirety	Defendants	
Exhibit 182	Entirety	Defendants	
Exhibit 255	Entirety	Defendants	

1	Exhibit B	Excerpts	Defendants	
2	Exhibit C	Excerpts	Defendants	
3	Exhibit E	Excerpts	Defendants	
4	Exhibit F	Entirety	Defendants	
5	Exhibit G	Entirety	Defendants	
6	Exhibit H	Entirety	Defendants	
7	Exhibit J	Entirety	Defendants	
8	Exhibit L	Excerpts	Plaintiff	
9	Exhibit O	Excerpts	Defendants	
10	Exhibit P	Excerpts	Defendants	
11	Exhibit Q	Excerpts	Defendants	

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14 **IT IS SO ORDERED.**

15 DATED: , 2022

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18 By _____
Honorable Edward M. Chen